8.0 IMPACTS FOUND TO NOT BE SIGNIFICANT

An Initial Study was prepared for the Valle Verde project in accordance with the requirements of *CEQA Guidelines* section 15063 to evaluate the potential for the project to result in significant environmental impacts. The Initial Study determined that the project has the potential to result in significant environmental effects. Therefore, this Environmental Impact Report has been prepared as required by *CEQA Guidelines* sections 15080 *et seq*. A copy of the Valle Verde Initial Study is provided in Appendix "A" of this EIR. The Initial Study identified potentially significant adverse environmental impacts that could result from the project; potentially significant adverse impacts that can feasibly be reduced to a less than significant level with proposed mitigation measures; and impacts that would not be significant.

Potentially Significant Impacts. The Initial Study determined that the Valle Verde project would have the potential to result in significant adverse environmental impacts, and those impacts would require evaluation in an EIR. The environmental issue areas identified by the Initial Study for further evaluation include:

- Biological Resources
- Transportation/Circulation

As a result of the environmental review scoping process, an evaluation of the proposed project's aesthetic impacts was added to the EIR. Analysis of the proposed project's effects related to these environmental issue areas is provided in Section 5.0 of this EIR.

Impacts That Can Be Reduced To a Less Than Significant Level. The Initial Study identified potentially significant project-related environmental impacts that could be reduced to a less than significant level by incorporating mitigation measures into the design, construction plans and/or operation of the project. Environmental issue areas identified as having potentially significant but mitigable impacts include:

- Aesthetics
- Geophysical Conditions
- Hazards (fire)
- Noise (short-term)
- Public Services (short-term solid waste disposal)

A summary of the analysis provided by the Initial Study and proposed mitigation measures for the issue areas listed above is provided in Section 8.1. Please refer to the Initial Study (EIR Appendix A) for the complete issue area analysis.

Less Than Significant Impacts. The Initial Study determined that the Valle Verde project would not result in significant environmental impacts regarding the following issue areas.

- Air Quality and Greenhouse Gas Emissions
- Cultural Resources
- Population and Housing
- Recreation
- Water Environment

A summary of the analysis provided by the Initial Study for these environmental issue areas is provided below. Please refer to the Initial Study (EIR Appendix A) for the complete issue area analysis.

8.1 IMPACTS THAT CAN BE REDUCED TO A LESS THAN SIGNIFICANT LEVEL

8.1.1 Geophysical Conditions

Seismic Hazards. The potentially active Lavigia fault has been mapped south of the project site in the mid-slope area of Campanil Hill. A trenching investigation (Fugro, 2006 and 2008, Initial Study Appendix H) conducted on the Rutherford property portion of the project site did not encounter the fault and it was determined that the project would have a low potential to experience ground rupture due to fault movement.

It is likely that the proposed buildings and structures will experience the effects of earthquake-related ground shaking during the life of the project. Similar to other development projects in the region, this impact can be reduced to a less than significant level by complying with applicable building code requirements. Due to the depth of ground water below the project site, there is also a low potential for the site to experience earthquake-induced liquefaction. Compliance with building and foundation preparation regulations (i.e., building code requirements) and recommendation provided by the geotechnical reports prepared for the project would further reduce the potential for liquefaction-related impacts. Proposed mitigation measure GEO-1 requires that the project comply with applicable requirements of the California Building Code and the recommendations provided by the project-specific geotechnical report.

The elevation of the project site is above the expected height of seismic sea wave run-up, and there are no large water bodies on or adjacent to the project site that would have the potential to result in a significant seiche impact.

Slope Stability. The geotechnical reports prepared for the Valle Verde project indicate that the project site is located in an area with a high landslide potential due to the presence of weak, erodible bedrock materials of the Santa Barbara Formation, and the moderately to steep sloping terrain on the site.

The geotechnical reports indicated that that there are no mapped landslides on the ascending slopes located on the west side of the proposed development area, including the Rutherford parcel, the proposed Maintenance Building area, or on the north area of the Valle Verde campus. According to the reports, observed on-site subsurface conditions do not support the potential for large-scale landslides. However, there are numerous older and recent landslides mapped in the Rincon Formation along the north flank of Campanil Hill south of the project site. The areas of active landsliding on the Campanil Hill slope are believed to be substantially southeast of the Rutherford property so that it would be highly unlikely that there are landslide hazards south of Torino Drive that would directly impact the proposed residential development on the Rutherford property, including the proposed access from Torino Drive. Impacts from deep seated landslides are considered to be a less than significant impact.

Shallow slope instabilities, earth flows, and erosional features consistent with the moderate to steep slopes of the Santa Barbara Formation to the west of the project site are likely to be present on the ascending slopes above the proposed development areas. The geotechnical reports determined that these surficial stability hazards could significantly impact proposed development areas if design recommendations outlined in the reports are not implemented. Proposed mitigation measure GEO-1 requires the applicant to submit final plans in substantial conformance with the recommendations of the geotechnical reports. Therefore, impacts from shallow slope instabilities, earthflows, and erosional features were determined to be a significant but mitigable impact.

8.1.2 Hazards

The Valle Verde campus is located north of and adjacent to the City-designated "Coastal Zone" Fire Hazard Area. The City of Santa Barbara Fire Department *Wildland Fire Plan* (2004) provides the following description of the Coastal Zone fire hazard area:

> *The Coastal Zone includes the Campanil Hill and Hidden Valley area and in addition, includes the area north of Hidden Valley which is included in the City of Santa Barbara Annexation Plan.*
>
> *The potential fire behavior in this zone is considered moderate to high depending on weather conditions. The majority of fuels are moderate and intermixed with residential areas; slopes range from 10 to 35 percent, and aspects in this zone vary. The ocean influence dominates this area for much of the year, however, there are a number of canyons directly aligned to periodic hot dry wind conditions that occur during our late summer and fall months. This zone has many pockets of moderate fuel made up of chaparral, and landscape vegetation. Isolated areas of heavy fuel consisting of eucalyptus and oak vegetation increase the hazard in specific areas within this zone.*

The Valle Verde Campus is not part of this high fire hazard area, however, the dense oak woodland and coastal sage scrub vegetation adjacent to proposed development on the Rutherford parcel presents an increased level of fire hazard risk.

Valle Verde has conducted fuel management activities along the western border of the campus for the past 10 years, and the managed area varies in width from 100 to 150 feet. The maintenance of this defensible space has removed ground covers and shrub material and resulted in limbing oak trees up to seven feet above the ground. This type of vegetation management is typical for high fire hazard zones and is consistent with regulatory requirements, such as Public Resources Code Section 4291. This regulation specifies that a 100-foot wide defensible space area be maintained, and that greater distances may be provided.

The Santa Barbara Fire Department reviewed the proposed Valle Verde development plans and determined that the project site is subject to a relatively high fire risk impact. The City's Wildland Fire Specialist evaluated the project and identified an appropriate defensible space clearance for proposed structures located along the western border of the proposed development area. This review determined that the previous amount of vegetation management is not necessary to protect the proposed structures. Based on existing vegetation and topography, it was determined that a 75-foot defensible space area would be adequate to provide wildland fire protection for existing and proposed structures on the Valle Verde project site. Mitigation measure HAZ-1 provided by the Initial Study requires that the proposed project adhere to the Fire Department's landscape guidelines and fuel management standards. Compliance with this measure would reduce project-related fire hazard impacts to a less than significant level.

8.1.3 Noise

Noise during construction is generally intermittent and sporadic, and after the completion of initial grading and site clearing activities, noise levels are generally reduced. Grading activities on the Valle Verde project site would result in short-term noise impacts to receptors in the area, primarily the residences in the adjacent Hidden Oaks neighborhood.

Demolition and grading operations have the potential to result in noise levels of 80-90 dBA measured at a distance of 50 feet from the noise source. Based on a noise source of 90 dBA at a location where the existing residence on the Rutherford parcel is located, and a separation distance of approximately 200 feet to the nearest residence in the Hidden Oaks neighborhood, peak construction noise at the adjacent residence would be approximately 78 dBA. Noise from construction of the proposed project components would generally result in noise levels that are lower than demolition and grading operations, but noise impacts to nearby residences would still have the potential to occur. Therefore, the Initial Study determined that noise from demolition, grading and construction operations would result in significant but mitigable noise impacts.

The implementation of proposed mitigation measures for project-related construction noise would be capable of reducing temporary peak construction noise impacts to sensitive receptors located on the project site and adjacent to the project site to a less than significant level. These measures include requirements to provide advance notice of construction activities to nearby residents (N-1); limitations on construction hours and days for noise-generating activities (N-2); construction equipment noise control (N-3); and the use of noise barriers when determined necessary (N-4).

8.1.4 Public Services

Construction and demolition activities required to implement the proposed project would generate a substantial amount of solid waste. Waste generated by new construction, remodeling and demolition result in one of the greatest challenges to the City related to maintaining existing solid waste diversion rates.

The County of Santa Barbara has adopted guidelines to estimate the amount of solid waste generated by construction and demolition projects. Based on those guidelines, it is estimated that proposed Valle Verde would generate approximately 1,221 tons of construction-related solid waste. The County of Santa Barbara's significance thresholds indicate that a project that generates more than 350 tons of construction and demolition debris would result in a significant solid waste disposal impact. Using this threshold of significance, the proposed project would result in a significant short-term solid waste disposal impact.

Proposed mitigation measure PS-1 requires that the Valle Verde project implement construction and demolition waste material recycling measures to the extent feasible, and achieve a 90 percent material recovery rate. With the implementation of this measure, short-term waste disposal impacts of the project would be reduced to a less than significant level.

8.2 LESS THAN SIGNIFICANT IMPACTS

8.2.1 Air Quality and Greenhouse Gas Emissions

Short-Term Emissions. Proposed grading, paving, and landscaping activities would have the potential to result in localized dust-related impacts and particulate matter (PM_{10} and $PM_{2.5}$) emissions. Using the URBEMIS 9.2.4 computer model, it was estimated that the project's PM_{10} emissions would be approximately 1.08 tons per year, and $PM_{2.5}$ emissions would be approximately 0.19 tons per year. To ensure that dust-related impacts remain less than significant, the Initial Study provides recommended dust control measures AQ-1 through AQ-24. These requirements are also included as standard conditions of approval.

Construction equipment would also emit NO_x and ROC. Using the URBEMIS 9.2.4 computer model, it was estimated that the proposed construction activities would generate approximately 2.52 tons of NO_x per year and 0.48 tons of ROG per year. These emissions would be substantially lower than the 25 tons per year short-term emission guideline used by the Santa Barbara Air Pollution Control District. Therefore, the project's impacts related to short-term emission impacts would be less than significant.

Long-Term Emissions. Long-term emissions of the Valle Verde project would result primarily from motor vehicle trips generated by the project. Using the URBEMIS 9.2.4 computer model, it was estimated that the long-term vehicle emissions of ROC would be 5.4 pounds per day, and NO_x emission would be 1.8 pounds per day. These emissions are substantially below the significance threshold of 25 pounds per day adopted by the APCD and the City of Santa Barbara. Therefore, the proposed project would have a less than significant long-term air quality impact.

Greenhouse Gas Emissions. On March 18, 2010, Appendix G of the CEQA Guidelines were amended to include two thresholds related to project-related emissions of greenhouse gases:

> *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
>
> *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The California Air Resources Board has determined that for the purposes of implementing AB 32, it is estimated that the 1990 level of greenhouse gas emissions in California was 427 million metric tons of carbon dioxide equivalents. Therefore, the target level for AB 32 emission reductions is also 427 million metric tons of carbon dioxide equivalents. The Air Resources Board staff has also estimated the State's greenhouse gas emissions in 2020 without the implementation of additional greenhouse gas reduction strategies. The 2020 "business-as-usual" estimate is approximately 596 million metric tons of carbon dioxide equivalents. The difference between the 2020 "business-as-usual" estimate and the 1990 emissions level is approximately 169 million metric tons and this is California's emission reduction goal. To achieve this reduction goal, a 30 percent statewide reduction in greenhouse gas emissions is required when compared to estimated business-as usual emissions that would occur in 2020 (CARB, 2008).

The Initial Study prepared for the Valle Verde project estimated that the project would generate approximately 554 tons of CO_2 per year from mobile sources (vehicles), area sources (water heating and space heating equipment) and construction equipment, which is equivalent to 0.0005 million metric tons. Additionally, the project would indirectly result in the generation of approximately 223 tons of CO_2 per year from electrical use. The project's estimated combined CO_2 emissions would be approximately

777 tons per year, or approximately 0.0007 million metric tons. In conclusion, the CO_2 emissions of the proposed project are very small and would not substantially interfere with the State's CO_2 emission reduction goals required to comply with AB 32. The project would include recycling of construction waste, the use of energy conserving construction materials, solar panels to decrease reliance on CO_2 generating power sources, and accessory uses that would reduce vehicle trips by providing resident-serving facilities on-site (meals, laundry, etc.) to reduce energy use and associated CO_2 emissions. Therefore, the Valle Verde project would not generate greenhouse gas emissions that would have a significant impact on the environment, or conflict with applicable City programs intended to reduce emissions of greenhouse gases.

8.2.2 Cultural Resources.

Archaeological Resources. The project site was surveyed to detect the presence of prehistoric and historic cultural materials. The survey did not detect the presence of any resources. Based on absence of prehistoric cultural remains, as well as the overall good to excellent reliability of the ground surface survey, the report concluded that the proposed project would not result in significant impacts to important historic or prehistoric cultural resources. However, there is a remote possibility of encountering unknown buried deposits during initial ground disturbing activities. For this reason a recommended mitigation measure has been provided that would require work in the area of an encounter cultural resource to be suspended, that a professional archaeologist be consulted, and that appropriate resource management practices by implemented.

Historic Resources. The existing residence on the Rutherford property would be demolished. A historic structures/site report prepared for the project determined that the house does not have historic significance. Therefore, the house is not considered to be a historic resource pursuant to CEQA standards, and demolition of the structure would not result in a significant impact.

8.2.3 Population and Housing

The Valle Verde project would result in the removal of seven on-site residences, including four studio units, the single-family dwelling on the Rutherford parcel, and two independent living units. The proposed project would provide 40 new dwelling units, resulting in a net gain of 33 dwelling units in the City. Therefore the project would have no housing- or population-related impacts.

8.2.4 Recreation.

The Valle Verde campus is a unique residential development as there are various on-site passive and active recreation opportunities for residents. There are extensive walkways throughout the campus, gazebos that are used for informal gatherings, a theater, a gymnasium, a pool, gardens, outdoor activity areas, and other facilities.

Therefore, any increase in park and recreation demand associated with the proposed project would be less than significant.

8.2.5 Water Environment

Short-Term. The entire Valle Verde campus drains to Arroyo Burro Creek. Project-related grading activities would have the potential to result in erosion and sedimentation that could adversely affect the water quality of the creek. The City requires the implementation of erosion control measures as standard conditions of approval and these measures were included in the Initial Study as recommended mitigation measures. Numerous federal, state and local regulatory programs have also been established to minimize impacts to water quality resulting from construction operations. Compliance with applicable regulations and the recommended mitigation requirements included in the Initial Study would reduce the potential for short-term construction-related water quality impact to a less than significant level.

Long-Term. The City and State require that projects provide on-site capture, retention, and treatment of storm water. Pursuant to the City's Storm Water Management Plan (SWMP) and the NPDES General Permit for Storm Water Discharges, the City requires that any increase in stormwater runoff (based on a 25-year storm event) be retained on-site and that projects be designed to capture and treat the calculated amount of runoff from the project site for a one-inch storm event over a 24-hour period.

A preliminary hydraulic report prepared for the Valle Verde project calculated the pre- and post-development storm runoff rates for the 10-, 25-, 50- and 100-year return period storm events. The analysis concluded that the project would result in an increase in storm water runoff due to an increase in impervious surface area from 4.43 acres of to approximately 5.16 acres.

To maintain pre-development runoff levels, a detention basin has been proposed on the Rutherford parcel. The detention basin would be approximately 16' x 104' and would be located under the proposed guest parking area on the Rutherford property. Outflow from the detention basin would be via an outlet pipe that would carry storm water to the existing storm drain system on Torino Road. The hydraulic report indicates that routing runoff from the Rutherford parcel tributary area through a detention facility would reduce peak runoff rates to below pre-development levels.

Following project approval, grading and construction drawings and public improvement plans for the proposed project would be reviewed and subject to approval by City Building and Public Works staff to assure compliance with applicable codes and standards. Sufficient engineered design shall be provided to ensure that the project does not result in significant long-term effects related to increased runoff, erosion and sedimentation, urban water quality pollutants, or groundwater pollutants. These measures are standard conditions of approval and included in the Initial Study as

recommended mitigation measures. Therefore, long-term impacts related to drainage were considered to be less than significant.